

## **REMARKS**

Reconsideration and allowance of this application are respectfully requested based on the following remarks.

### **1. Overview of Non-Final Office Action**

Claims 1, 4, 5, 7, 10-13, 16, 19, 21 and 22 are all the claim pending in the present application before this Amendment, and rejected under 35 U.S.C. 103(a) as being unpatentable over Anderson et al. (US 6,567,122; hereafter “Anderson”) in view of Sistanizadeh et al. (US 6,452,925; hereafter “Sistanizadeh”).

### **2. Analysis of Claim Rejections**

Applicant amends independent claims 1, 7, 13 and 19 based on the original disclosure without prejudice or disclaimer. No new matter is added. These independent claims further distinguish the claimed inventions from the cited references.

With regard to claim 1, the Examiner asserts that Anderson discloses all the claim elements of the claimed network system except that Sistanizadeh discloses the DHCP server which is not disclosed in Anderson. Applicant respectfully traverses the Examiner’s position.

In claim 1, the agent server of the claimed network system is provided:

for searching said database for said variable IP address of said at least one network unit on the basis of the unique identification information received from the user, and  
for enabling the user to gain access to said selected network unit in accordance with results of the searching of said database,  
wherein said unique identification information of said network unit received from the user includes at least one of an Ethernet address of said at least one network unit and a search keyword for said variable IP address of said at least one network unit.

With regard to the above aspect of claim 1, the Examiner asserts that the claimed agent server is taught by Anderson’s ID server 760 (FIGs. 7 and 10). Further, it is alleged that the claimed database, variable IP address, at least one network unit, user, and unique identification information received from the user are also taught by Anderson’s database (registry 1001), address 1002, camera 100 (FIG. 7), user 720, and an identity (URL) of camera 100, respectively.

However, the function of the claimed agent server is clearly different from that of Anderson's ID server 760.

The claimed agent server (through its control unit) searches for a variable IP address of at least one network unit on the basis of the unique identification information received from a user (comprising at least one of an Ethernet address of said at least one network unit and a search keyword for said variable IP address of said at least one network unit). In contrast, Anderson discloses that a user first accesses a web site of ID server 760 to find information on camera 100 such as the identity and variable IP address as shown in FIG. 10 (camera 100 and address 1002), and then, enters the identity of camera 100 into this web site of IP server 760 to find out a current internet address of camera 100.

In the above, the URL of the ID server 760 web site or the identity of camera 100 may be alleged to correspond to the claimed unique identification information received from a user (comprising at least one of an Ethernet address of said at least one network unit and a search keyword for said variable IP address of said at least one network unit).

However, the URL of the ID server 760 web site is only an Internet address of ID server 760 (e.g., www.idserver760.com, or 211.1444.88.95), and this URL cannot be an Ethernet address (e.g., 0000f0ffa101 which is a hexadecimal 48 bit address) as described in paragraphs [36] - [37] of US 2002/0091791 A1 of the present application.

The URL of the ID server 760 also is not a search keyword. No one of ordinary skill in the art would have understood that the URL of ID server 760 is a search keyword used to find a current Internet address of camera 100.

The identity of camera 100 also cannot be an Ethernet address because Anderson (col. 9, lines 44-45) describes that the identity of camera 100 is a URL of camera 100. For the same reason that a URL is not an Ethernet address, the URL of camera 100 is not the claimed Ethernet address.

However, the identity of camera 100 may be alleged to correspond to a search keyword for camera 100, thereby disclosing the claimed unique identification information received from the user. As known in the art, however, the URL of camera 100 is not a search keyword for

camera 100 because the URL (e.g., [www.camera100.com](http://www.camera100.com)) is merely an Internet address as discussed above. Also, the camera 100 listed in registry 1001 as shown in FIG. 10 of Anderson is not a search keyword because the camera 100 shown therein is a name of camera 100 *itself*, and thus, cannot be understood as a search keyword by one of ordinary skill in the art. In Anderson, a user is required to enter into the ID server 780 web site the URL or name of camera 100 received from camera 100 to obtain the current Internet address of camera 100 (col. 9, lines 39-50). However, Anderson does not disclose or suggest using a search keyword at the ID server 760 to find out the current Internet address of camera 100.

Thus, Applicant respectfully submits that, regardless of Sistanizadeh's disclosure of a DHCP server, the claimed agent server provided for the above-quoted features is not taught or suggested in Anderson.

Accordingly, claim 1 and corresponding claims 7, 13 and 19 would not have been obvious over Anderson in view of Sistanizadeh.

Claims 4, 5, 11, 12, 16, 21 and 22 should be allowable at least by virtue of their dependencies and additional elements recited therein.

Claim 10 is canceled.

### **3. New Claims**

Applicant adds new claims 23-31 to claim additional novel features of the invention. Support for the new claims can be found in the original disclosure (e.g., FIG. 5 and paragraphs [44]-[47] of US 2002/0091791 of the present application. No new matter is added.

Anderson and Sistanizadeh, alone or in combination, do not disclose or suggest the features of the new claims. Accordingly, entrance and allowance of the new claims are respectfully requested.

### **4. Conclusion**

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the

Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,

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